

**REMARKS**

This paper is being presented in response to the Final Office Action dated January 26, 2005, in which claims 1-58 have been rejected under 35 U.S.C. 102(e) as anticipated by Sawada U.S. Patent No. 6,735,619 ("Sawada"). Based upon the foregoing amendments and following comments, Applicants respectfully request reconsideration and allowance of the application.

By way of this amendment, independent claims 1, 14, 15, 24, 50, and 58 have been amended. Applicants respectfully submit that each of the foregoing amendments are in full compliance with the requirements of Rule 116, inasmuch as the amendments raise no new issues, do not increase the total number of pending claims, and present limitations for purposes of (i) correcting matters of a formal nature (see, e.g., claim 58), (ii) reciting elements of claims of the application as originally filed, or (iii) more clearly reciting what Applicants regard as their invention. It is therefore submitted that the foregoing amendments require no further searching.

More specifically, independent claim 1 is amended to specify that the method includes the steps of transmitting from the first and second devices the first and second network identification tags on the first and second I/O networks, respectively. Support for these amendments can be found, for example, in claims 14 and 15 of the application as originally filed, as well as at page 6, line 10 – page 7, line 8. Claims 14 and 15 depend from claim 1, and have been amended in light of the amendments thereto.

By the foregoing amendments, independent claim 24 specifies that first and second units are adapted to store first and second unique network identification tags for the first and second I/O networks, respectively, as well as to make such identification tags available on such respective networks. No new matter has been added by these amendments. See, e.g., claim 1 of the application as originally filed, as well as page 10, lines 15-22.

Independent claim 50 is amended to clarify what Applicants regard as their invention in connection with the recitation of the term "identify." Specifically, claim 50 now recites that a second routine is adapted to identify which one of a plurality of I/O networks is the selected I/O network. Support for this amendment can be found, for example, at page 3, line 26 – page 4, line 11; page 11, line 9 – page 13, line 24.

Claims Rejections Under 35 U.S.C. 112

Applicants respectfully traverse the rejection of claims 1 and 24 under 35 U.S.C. 112, second paragraph, as failing to set forth the subject matter which Applicants regard as their invention. For purposes of clarification, Applicants regard the recitation of claims 1 and 24 as the subject matter of their invention. To the extent that any statement set forth in the remarks of the paper entitled "Amendment A" and filed September 2, 2004, suggests otherwise, it is respectfully submitted that a rejection on that basis is rendered moot by the foregoing comment. The rejection is further rendered moot by the foregoing amendments to claims 1 and 24.

Claim Rejections Under 35 U.S.C. 102(e)

Claims 1-58 stand rejected under 35 U.S.C. 102(e) as anticipated by Sawada U.S. Patent No. 6,735,619 ("Sawada"). In response, claims 1, 24, and 50 have been amended to traverse these rejections. Applicants therefore respectfully request reconsideration and withdrawal of these rejections.

Independent claim 1, as amended, recites, in part, the steps of storing first and second network identification tags in first and second devices communicatively coupled to first and second I/O networks, respectively, and transmitting, from the first and second devices, the first and second network identification tags on the first and second I/O networks, respectively. The IEEE 1394 plug and play functionality disclosed in Sawada fails to teach both of these storing and transmitting steps, inasmuch as the IEEE controller, and the gateway device in which the IEEE controller resides, do not transmit a network identification tag on an I/O network. More particularly, the IEEE 1394 standard involves detecting when a device, such as a lamp or a camera, is connected to a node of an IEEE 1394 bus for a home network, after which the gateway device, via the IEEE controller, reads and stores a node ID and other device information. While such node ID and other device information is stored in a mapping table 60 in storage apparatus 57 of the gateway device (see Figs. 9A and 9B), the gateway device does not and, in fact, has no reason to, transmit such information on the IEEE bus or elsewhere on the home network. One reason for this lies in the nature of the IEEE standard itself, namely that in the event of an additional device connection, a bus reset is automatically issued, and new node IDs are automatically assigned. See Sawada, col. 9, lines 49-55. More generally, however,

there is no need to transmit a network identification tag on the network because the device connection has already been made.

Furthermore, Applicants note that the rejection of claim 24 set forth on page 12 of the Final Office Action dated January 26, 2005, posits that the camera and lamp, i.e., devices connected to the home network, are the first and second units that make the network identification tags available on the first and second networks (citing Sawada, col. 5, lines 35-45; and, col. 6, lines 35-50). Even if these devices make such network identification tags available, the teachings of Sawada do not describe these devices as storing the network identification tags, as recited in claim 1. On the contrary, Sawada discloses that the route of device information begins at a ROM 80 of the device, flowing in one direction (labeled with arrows 1, 1', and 1'' in Fig. 3) toward the aforementioned storage apparatus of the gateway device. At no point along that route is the device information stored anywhere outside of the gateway device. As a result, Applicants submit that the devices, such as the lamp and camera, connected to the home network cannot constitute the first and second devices in which the network identification tags are respectively stored and from which the tags are transmitted.

For at least the reasons set forth above, it is respectfully submitted that Sawada fails to disclose or suggest every element or step of claim 1. It follows that claim 1 and, by implication, claims 2-23 dependent thereon, are patentable over the cited reference and, accordingly, Applicants respectfully requests allowance of claims 1-23.

Independent claim 24, as amended, recites, in part, first and second units of a process control system that are communicatively coupled to first and second I/O networks, respectively, and that are adapted to store first and second unique network identification tags for the first and second I/O networks, and to make such respective unique identification tags available on the first and second I/O networks, respectively. As discussed above in connection with claim 1, the gateway device in which network identification tags are stored does not make them available on the home network, let alone on first and second I/O networks, respectively. As a result, claims 24-49 are allowable for at least the reasons discussed above in connection with claim 1. Thus, for at least these reasons, claims 24-49 are patentable over the cited reference and, accordingly, Applicants respectfully request allowance of claims 24-49.

Independent claim 50, as amended, recites, in part, a diagnostic tool for identifying a selected I/O network for which a network identification tag has been made available, the diagnostic tool comprising a second routine to identify which one of the plurality of I/O networks is the selected I/O network based on the received network identification tag.

Even if one considers that Sawada presents aspects of a diagnostic tool, Applicants respectfully submit that Sawada fails to disclose or suggest a routine to identify which one of a plurality of I/O networks is the selected I/O network, as recited in claim 50, because the IEEE 1394 standard upon which the Sawada system is based teaches a technique that recognizes all of the network nodes to which devices are attached. In short, it does not identify one network out of the plurality, but instead reads node IDs for the entire plurality. See, e.g., the cited portions of Sawada, namely col. 6, lines 20-30. Specifically, after reading all of the node IDs, the IEEE controller and the gateway device in which it resides lists each node ID in the aforementioned mapping table. But the list does not identify which one of a plurality of I/O networks is the selected network, as recited in claim 50. Such identification of one of the plurality is neither performed by, or of interest to, the IEEE controller and gateway device of Sawada because the IEEE standard allows a device to be connected to any node for operation.

Thus, it is respectfully submitted that Sawada fails to disclose every element of claim 50 for at least the reasons set forth above. It follows that independent claim 50, and by implication claims 51-58 dependent thereon, are patentable over the cited reference and, accordingly, Applicants respectfully request allowance of claims 50-58.

### CONCLUSION

Applicants have now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request reconsideration and allowance of claims 1-58.

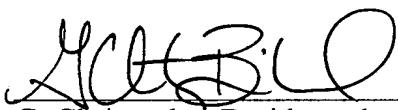
Although Applicants believe that no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 13-2855 of Marshall, Gerstein & Borun LLP. In addition, if a petition for an extension of time under 37 CFR 1.136(a) is necessary to maintain the pendency of this case and is

not otherwise requested in this case, Applicants request that the Commissioner consider this paper to be a request for an appropriate extension of time and hereby authorize the Commissioner to charge the fee as set forth in 37 CFR 1.17(a) corresponding to the needed extension of time to Deposit Account No. No. 13-2855 of Marshall, Gerstein & Borun LLP. A copy of this paper is enclosed herewith.

If there are matters that can be discussed by telephone to further the prosecution of this application, Applicants respectfully request that the Examiner call their attorney at the number listed below.

Respectfully submitted,

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